Municipal Drinking Water Licensing Program Bulletin

Ministry of the Environment

Safe Drinking Water Branch

A bulletin for municipal drinking water system owners and operators

Issue #4 February 2013

Following on the success of a Drinking Water Quality Management Standard (DWQMS) workshop in April 2012, the Ministry of the Environment is collaborating with the Walkerton Clean Water Centre (WCWC), the Municipal Water and Wastewater Regulatory Committee (MWWRC) and several municipalities to hold a second round of DWQMS workshops for owners and operating authorities of municipal drinking water systems.

The feedback from last year's workshop was so positive we are offering multiple workshops in locations across the province in hopes of reaching a broader audience. The theme of this year's workshop is DWQMS Best Practices, and we hope you can join us at one of the following locations:

Date	Location	Venue
March 6 & 7, 2013	City of Guelph	Best Western Plus Royal Brock Hotel & Conference Centre
March 27 & 28, 2013	City of Kingston	Four Points by Sheraton Kingston
April 18 & 19, 2013	City of Timmins	Days Inn Hotel & Conference Centre
April 24 & 25, 2013	City of Thunder Bay	Airlane Hotel & Conference Centre

As you may be aware, the Safe Drinking Water Branch (SDWB) is currently undertaking a review of the Municipal Drinking Water Licensing Program (MDWLP) and the Accreditation Program for Operating Authorities. Several rounds of stakeholder consultation have taken place and stakeholder feedback has been assessed and considered in the proposed enhancements to the MDWLP.

The format of the session will be highly interactive and participants should be prepared to speak to the best practices, challenges and successes at their own drinking water system. Please visit WCWC's website to register for a session and for further information: https://www.wcwc.ca/en/training/scheduled-courses/.

This is not the only opportunity that stakeholders will have to comment on the proposed changes as the revised DWQMS will be posted on the Environmental Bill of Rights (EBR) in the spring/summer of 2013.

If you are unable to attend one of the sessions but would like to provide the ministry with feedback, please send an email to mdwlp@ontario.ca with your comments and/or suggestions. Alternatively, you can provide anonymous feedback directly to the ministry by completing the following survey: www.surveymonkey.com/s/21elements.

This bulletin contains program updates for municipal drinking water system owners and operators. If there is a topic you would like to see covered in a future edition, or if you have questions about any of the topics covered in this issue, please contact the Approvals & Licensing Section of the Safe Drinking Water Branch (Ministry of the Environment) at mdwlp@ontario.ca.

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Continual Improvement: Element 21 of the DWQMS

Now that you've received accreditation, your operational plan should identify specific dates and timeframes for reviewing and updating aspects of your Quality Management System (QMS). In upcoming audits of your QMS, you will need to demonstrate that you have met these timeframes.

Element 21 of the DWQMS encourages you to strive to continually improve your QMS. While performing scheduled reviews and updates is a key part of improving your QMS, this alone will not be enough to demonstrate continual improvement. Continual improvement is not about fixing things that are broken; it's about understanding what you already do well, and finding ways to do it better.

While you were developing and implementing your QMS, the focus of your improvements was on addressing non-conformances and ensuring your QMS met the requirements of the DWQMS. You had to address most of these non-conformances in order to receive accreditation. While additional non-conformances may be identified in future audits, they should decrease over time as your QMS matures.

As non-conformances decrease, your efforts should shift to finding ways to improve your QMS. A lot of data is generated by water treatment and distribution processes, especially the sampling and monitoring occurring within those processes. Analysis of the data for trends and opportunities for improvement should be considered as an integral part of your continual improvement efforts. Commentary from all stakeholders generated by the publication of your QMS policy also serves as input – particularly those comments directly related to improving consumer satisfaction.

If all the analysis, correcting and reviewing you perform doesn't result in a change to your QMS, there are no improvements being made. It is important you use the information collected to identify any quality-related problem(s), deviation from the QMS or non-conformance that occurred. Any documented corrective actions you've implemented to address and prevent these issues can be used to demonstrate continual improvement.

Changing Your Operating Authority

Section 13(1) of the Safe Drinking Water Act, 2002 requires that an accredited operating authority (OA) be in charge of your drinking water system at all times. It is important to consider this when you are planning to transition to a new operating authority. Your new OA should receive accreditation **before** they take over operation of your drinking water system.

As part of transitional planning, adequate time should be allowed for your new OA to apply to achieve accreditation. Limited Scope – Transitional accreditation was specifically designed as part of the Accreditation Protocol to facilitate this transition to a new OA. This limited accreditation focuses on nine key elements of the DWQMS and was designed so that accreditation can be issued within a shortened timeframe, allowing your new OA to take over operations as soon as possible.

Did you know?

All operational plans for a drinking water system remain the property of the owner of the system, irrespective of who prepares or revises the plans (s. 17(1) of the Safe Drinking Water Act, 2002).

The existing operational plan for your system can provide your new OA with a great deal of assistance in preparing an application for Limited Scope – Transitional accreditation.

To apply for accreditation, please contact one of two accreditation bodies listed below. You should also notify the MOE once the transition is underway, so that the OA(s) identified on your Licence can be updated.

NSF International Strategic Registrations
Email: canada@nsf.org
Phone: 1-866-261-0086; Direct 1-519-821-3334

SAI Global
Email: dwqms@saiglobal.com
Phone: 1-416-401-8672

Common Questions about the DWQMS

Sometimes it may not be immediately clear how a specific element of the DWQMS relates to your drinking water system. If you have a question that you would like to see answered in a future issue of the bulletin, please email mdwlp@ontario.ca.

Element 16a of the DWQMS refers to "conditions most challenging" to the drinking water system. What does this mean?

It is important to ensure that sampling, testing and monitoring are done under conditions that challenge the system, such as after a heavy rainfall, or at the farthest ends of the distribution system, where the water has the longest residence time. These "conditions most challenging" are likely addressed by the current design of your drinking water system and/or your current operational practices.

In your operational plan, you should document these challenging conditions and describe what steps you take, from a sampling, testing and monitoring perspective, to ensure continued process control.

Element 19 of the DWQMS requires that an internal audit of the QMS is conducted every 12 months. Does the internal audit need to cover all elements of the DWQMS, or could a sample of the DWQMS elements be audited?

Element 19b of the DWQMS provides you with the flexibility to determine the audit criteria, frequency, scope, methodology and record-keeping requirements for your internal audits. While the DWQMS does not prescribe which elements of the DWQMS are required to be covered in each internal audit, the procedure documented in your operational plan should ensure that the QMS is evaluated for conformity with the DWQMS. An auditor is likely to identify a non-conformity if your documented procedure does not include a plan for evaluating conformity with all elements of the DWQMS (i.e., review all elements of the DWQMS with every internal audit or all elements of the DWQMS over a series of internal audits).

Common Questions about the Licence & DWWP

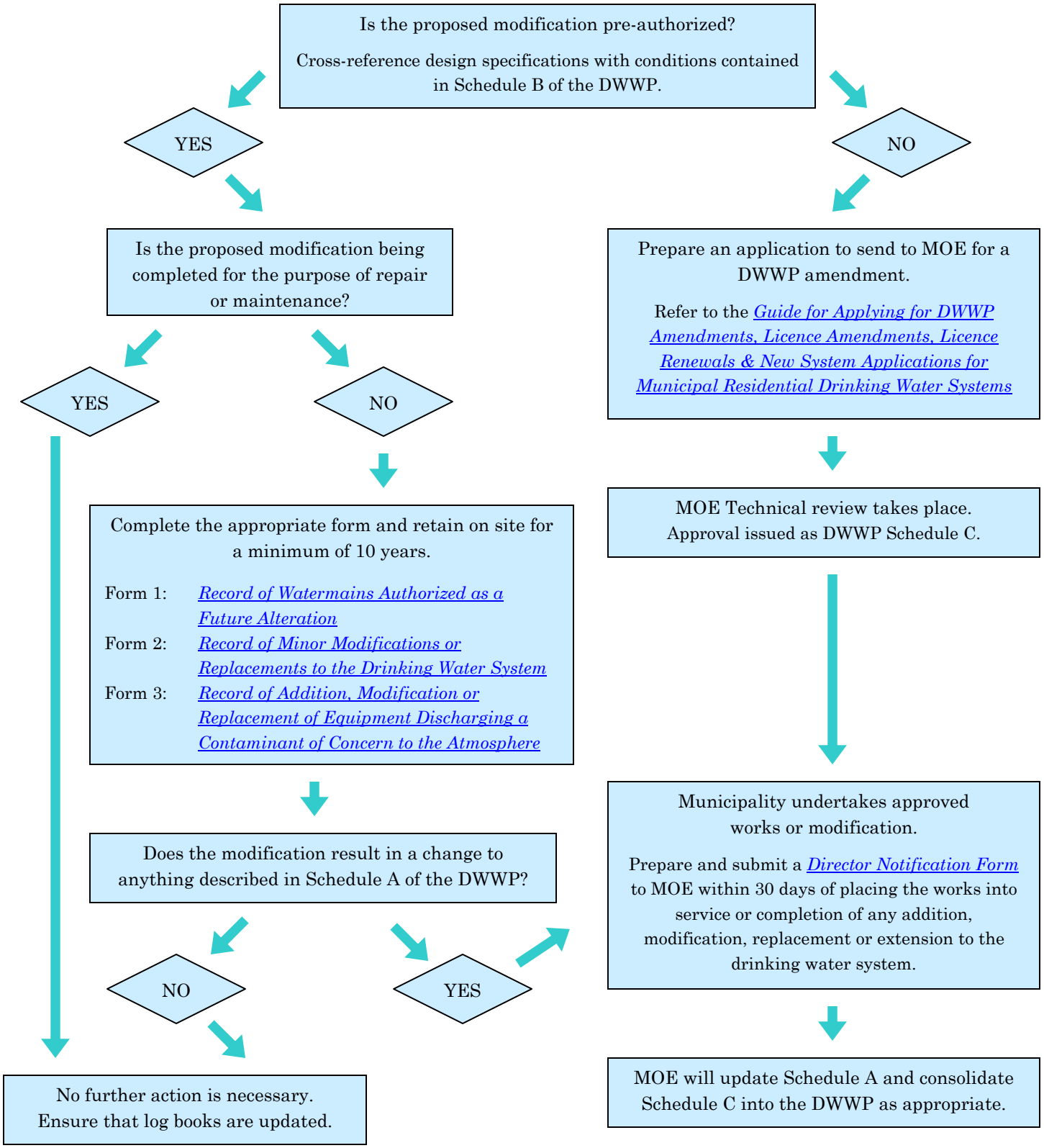
If you have a question that you would like to see answered in a future issue of the bulletin, or have a specific question about a condition in your Licence/Drinking Water Works Permit (DWWP) please email mdwlp@ontario.ca.

Schedule A of the Municipal Drinking Water Licence for my system lists an "application for renewal" date. I understand I need to apply to renew my licence in advance of this date, and that I also need to update the financial plan for my system. When does this financial plan need to be updated?

Once a system is licensed, financial plans are required to be updated in conjunction with every application for licence renewal. Your Financial Plans should be updated and submitted **before** making an application to renew the drinking water licence. For example, if the application for renewal date in Schedule A of your Licence is January 1, 2014, the financial plan would need to be updated, approved and submitted to the Ministry of Municipal Affairs and Housing in advance of this date (before submitting your application to renew your Licence).

Pre-Authorization Conditions in Drinking Water Works Permits

The Drinking Water Works Permit (DWWP) offers some flexibility in terms of adding, modifying, extending or replacing parts of your drinking water system without obtaining further authorization or approvals from the ministry. The decision tree below can assist you in determining the requirements that apply modifications you are undertaking.


Is the proposed modification pre-authorized?
Cross-reference design specifications with conditions contained in Schedule B of the DWWP.
YES
NO
Is the proposed modification being completed for the purpose of repair or maintenance?
YES
NO
Prepare an application to send to MOE for a DWWP amendment.
Refer to the Guide for Applying for DWWP Amendments, Licence Amendments, Licence Renewals & New System Applications for Municipal Residential Drinking Water Systems
MOE Technical review takes place. Approval issued as DWWP Schedule C.
Complete the appropriate form and retain on site for a minimum of 10 years.
Form 1: Record of Watermains Authorized as a Future Alteration
Form 2: Record of Minor Modifications or Replacements to the Drinking Water System
Form 3: Record of Addition, Modification or Replacement of Equipment Discharging a Contaminant of Concern to the Atmosphere
Does the modification result in a change to anything described in Schedule A of the DWWP?
NO
YES
Municipality undertakes approved works or modification.
Prepare and submit a Director Notification Form to MOE within 30 days of placing the works into service or completion of any addition, modification, replacement or extension to the drinking water system.
No further action is necessary. Ensure that log books are updated.
MOE will update Schedule A and consolidate Schedule C into the DWWP as appropriate.